

# EXHIBIT C

May 8, 2023

City of Stuart, FL, v. 3M Company et al.,  
No. 2:18-cv-03487

## Plaintiff's Core Trial Exhibits

to which Defendants Have Remaining Objections Outside of Motion in Limine Objections

Ex. No.	Beg Bates	Description	Defendants' Remaining Objections
P1.AFFF0252	3M_AFFF_MDL02182920		3M: Agree that it can be used at trial to the extent a proper foundation is laid under FRE 803(18).
P1.AFFF0254	NF000108822		National Foam: 401, 403, HRS w/in HRS, Lobbying.
P1.AFFF0385	3M_MN00051484		3M: Agree that it can be used at trial to the extent a proper foundation is laid under FRE 803(18).
P1.AFFF2057			DuPont: 401, 403. Ammonium Perfluoroctanoate TLV is irrelevant to AFFF.
P1.AFFF2067	EID071436		DuPont: 401, 403. FC-143 is irrelevant to AFFF.
P1.AFFF2149	EID599980		DuPont: 401, 403. FC-118 is irrelevant to AFFF.
P1.AFFF2269	3M_AFFF_MDL00238619		DuPont: 401, 403. FC-143 is irrelevant to AFFF.
P1.AFFF2436	3M_AFFF_MDL01591598		3M: Hearsay as to handwriting.
P1.AFFF2489	3M_AFFF_MDL03251903		3M: Hearsay because document is unauthored and undated and source of document is unclear. Hearsay within hearsay because document cites statements of third parties.
P1.AFFF2492	3M_AFFF_MDL03374814		3M: Hearsay because document is unauthored and undated. Hearsay within hearsay because document reports statements of third parties.
P1.AFFF2498	3M_BELL00039544		3M: Hearsay within hearsay and authenticity as to handwritten notes, including but not limited to pages 7, 11, 16-18, 22-32, 113-15.
P1.AFFF2693	3MPRODUCTSAMPLE0000001		3M: Hearsay because report by third party group Eurofins.
P1.AFFF3168	BEACHEDGE_00001405		DuPont: Hearsay; 401, 403 as to European regulations. Document from witness file and is not a DuPont business record.
P1.AFFF3270	FFFC002597		3M: Hearsay because it is a statement of FFFC, which is not a party to this case.
P1.AFFF3427	PENNA-NAVY-018348		DuPont: Hearsay between Bowling, Atkins, and Dierdorf. Would agree to redactions down to Korzeniowski.
P1.AFFF3692		Fire Fighting Foam Coalition. Fact Sheet on AFFF Fire Fighting Agents. Arlington, VA: Fire Fighting Foam Coalition; 2009.	3M: 401 because FFFC is irrelevant to 3M. Hearsay because third party (FFFC) publication. Completeness because first page of document appears to be largely redacted. Authenticity because source of document is not clear.  DuPont: Authenticity; Completeness (first page appears to be largely redacted).
P1.AFFF3922		National Toxicology Program (NTP). 2016. Monograph on Immunotoxicity Associated with Exposure to Perfluoroctanoic acid (PFOA) and perfluoroctane sulfonate (PFOS). Research Triangle Park, NC: National Toxicology Program. <a href="https://ntp.niehs.nih.gov/ntp/ohat/pfoa_pfos/pfoa_pfosmonograph_508.pdf">https://ntp.niehs.nih.gov/ntp/ohat/pfoa_pfos/pfoa_pfosmonograph_508.pdf</a> .	3M: Hearsay within hearsay as to discussion of third-party studies and statements, including but not limited to on pages 9-10, 23-29, 51-56.
P1.AFFF3925		National Toxicology Program website printout. 2021. Per- and polyfluoroalkyl substances (PFAS).	3M: Hearsay within hearsay as to discussion of third-party studies and statements on pages 2-6.
P1.AFFF3948		Oiltechnics Fire Fighting Products. 2017. Fire fighting foam update. C6 foams.	3M: Authenticity because source is unclear. Hearsay because third-party document.
P1.AFFF4108		U.S. Environmental Protection Agency (EPA). Health Effects Support Document for Perfluorooctane Sulfonate (PFOS). May 2016. <a href="https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos">https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos</a> .	3M: Hearsay within hearsay as to discussion of third-party studies and statements, including but not limited to pages 31-50.
P1.AFFF4152		U.S. Environmental Protection Agency. Press Release. "EPA Advances Science to Protect the Public from PFOA and PFOS in Drinking Water." Nov. 16, 2021. Internet: <a href="https://www.epa.gov/newsreleases/epa-advances-science-protect-public-pfoa-and-pfos-drinking-water">https://www.epa.gov/newsreleases/epa-advances-science-protect-public-pfoa-and-pfos-drinking-water</a> .	DuPont: Hearsay and 403 (prejudicial).
P1.AFFF4245	NF000075766		National Foam: 401, 403, HRS.
P1.AFFF4248	FFFC002544		3M: Hearsay because it is a statement of FFFC, which is not a party to this case.

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Ex. No.	Beg Bates	Description	Defendants' Remaining Objections
P1.AFFF4251	3M_AFFF_MDL03180750		3M: Hearsay within hearsay as to statements by 3M.  DuPont: 401, 403. FC-143 is irrelevant to AFFF.
P1.AFFF4255	3MA00257421 - dupe		3M: Improper demonstrative. 403 because excerpts of document and deposition transcript are unduly prejudicial and confusing. Deposition transcript excerpts are subject to deposition designation objections.
P1.BB042	3MA00631017		DuPont: Rule 401, 403 FC-143 irrelevant to AFFF.
P1.BB050	3M_BELL03185977		3M: Hearsay as to the entire document because it is not clear on its face what it is, who wrote it, or when.
P1.BB434	3MA00967406		3M: Authentication and hearsay as to handwritten notes.
P1.BB526			3M: Hearsay as to 3M (this is a Dynax document). Relevance because Dynax has been dismissed.
P1.DL0004	3M_BELL00985788		3M: Hearsay as to report by third party. Hearsay within hearsay as to statements by 3M including but not limited to pages 2-5.
P1.DL0006	3M_AFFF_MDL00234610		3M: 403 and best evidence because pages 1-20 are illegible and confusing. Hearsay because some pages are unauthored and some pages are authored by third party (DuPont).  DuPont: Rule 401, 403 FC-143 irrelevant to AFFF. Illegible and confusing.
P1.DL0007	3M_MN02267863		3M: Hearsay because letter from third party to third party.
P1.DL0008	3M_BELL00054589		3M: Hearsay because document is unauthored and undated. Hearsay within hearsay because document cites statements of third parties.
P1.DL0009	3MA00967400		3M: Hearsay, foundation, and authenticity as to handwriting.
P1.DL0013	3M_AFFF_MDL00080683		3M: Hearsay because unauthored and no indication of source of document. Hearsay within hearsay to the extent the document is citing other sources.
P1.DL0018	3M_AFFF_MDL00499393		3M: Hearsay because unauthored and no indication of source of document. Hearsay within hearsay to the extent the document is citing other sources.
P1.DL0029	USEPA 15743 / WJB000002		DuPont: Rule 401, 403 FC-143 irrelevant to AFFF.
P1.DL0030	EID917954 / GLK000699		DuPont: Rule 401, 403 FC-143 irrelevant to AFFF.
P1.DL0031	3M_BELL00039001		3M: Hearsay because unauthored, undated; no indication of source of document. Hearsay within hearsay to the extent the document is citing other sources. incomplete because sources of footnotes are not provided.
P1.DL0032	USEPA 15640 / RCG000172		DuPont: Rule 401, 403 FC-143 irrelevant to AFFF.
P1.DL0033	3M_BELL02610941		3M: Hearsay within hearsay as to statements by other sources including ICI.
P1.DL0034	EID918337 / GLK002093		DuPont: Rule 401, 403 FC-143 irrelevant to AFFF.
P1.DL0035			3M: Hearsay within hearsay as to statements by other sources.
P1.DL0037	EID008492		DuPont: Rule 401, 403 FC-143 irrelevant to AFFF.
P1.DL0040	3M_BELL00039915		3M: Completeness because file appears corrupted for example on page 4.
P1.DL0052	3M_BELL00848126		3M: Hearsay because document is unauthored and undated, source of document is unclear, and contains unidentified handwriting.
P1.DL0060	3M_BELL00050765		3M: Hearsay because letter from third party and as to handwriting.
P1.DL0086	3M_BELL02617361		3M: Hearsay because document is undated, unauthored, and contains handwriting.
P1.DL0093	Navy02-00002442		3M: Hearsay because third party document (FFFC). 401 because FFFC is irrelevant to 3M.
P1.DL0094		Jönsson, J.E. Fact sheet on C6 fluorinated surfactants. www.fomtec.com.	3M: Hearsay because third party document (Fomtec).
P1.DL100	AFFF-MDL-CHE-00001790		3M: Hearsay because it is a statement of FFFC, which is not a party to the case.
P1.DL147		P1.6723 (C8 MDL trials exhibit)	3M: Agree that it can be used at trial to the extent a proper foundation is laid under FRE 803(18).  DuPont: Hearsay.
P1.DL151		P1.8688 (C8 MDL trials exhibit)	3M: Agree that it can be used at trial to the extent a proper foundation is laid under FRE 803(18).
P1.DL273	EID086757 / RCG000094		DuPont: Rule 401, 403 FC-143 irrelevant to AFFF.
P1.DL284			3M: Authenticity as to the handwritten notes on page 1.
P1.DL354	3M_BELL01945370		3M: Hearsay and authenticity as to the handwritten notes on pages 1 and 2.

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P1.DL0358		Barboza D. "E.P.A. Says It Pressed 3M for Action on Scotchgard Chemical." New York Times. May 19, 2000. (original publication)	3M: Authenticity and illegibility as to the entire document.
P1.DL0371		10.2006 2010/15 PFOA Stewardship Program Guidance on Reporting Emissions and Product Content	3M: 401/403 because it is a complex and technical EPA document about requirements for reporting emissions that are not relevant to this case and would confuse the jury into thinking there is widespread contamination or emissions outside of Stuart; Hearsay because it is a statement by EPA, which is not a party.
P1.DL0389	US-Darwin-00010031		National Foam: 401, 403. Plaintiffs have stipulated that the only NF branded product at issue is Universal Gold. Document relates to a Manufacturing Procedure for a product other than Universal Gold.
P1.DL0390	3M_AFFF_MDL00579820		3M: Hearsay because it is a statement of Clifford B. Hicks/Popular Mechanics, neither of which are parties to this case.
P1.DL0434		US2732398	National Foam: Relevance: No allegations Chemguard FS-220B used by Stuart Fire Rescue, therefore irrelevant to this case; 401, 403, HRS; 602 HRS. Email exchange between 2 UK employees of UTC Fire & Security about foams manufactured in the UK and never sold in the US and about FS not used in Universal Gold.
P1.DL0446	3M_AFFF_MDL01306235		3M: Authenticity and hearsay as to the handwritten notes on pages 1, 2, 4, 5, 6, 8, and 10.
P1.DL0447	3M_AFFF_MDL01306281		3M: Authenticity and hearsay as to the handwritten notes on pages 3, 4, and 6.
P1.DL0452	Kidde_Defendants_00251176		Kidde: 401, 403. This document is not relevant to any issues in dispute. The topic of the email -- the "buffer" in a formulation of AFFF not at issue -- is not relevant to this case. It will also be confusing for the jury and unduly prejudicial for the recipient of the email, Anne Regina, to be referred to as the "Queen of Foam" when (i) there is no evidence she was regularly referred to in that way; and (ii) the use of that appellation in this email has nothing to do with any of the issues in dispute.
P1.DL0454	NF000613052		National Foam: 401, 403. Plaintiffs have stipulated that the only NF branded product at issue is Universal Gold. Document relates to a Manufacturing Procedure for a product other than Universal Gold.
P1.DL0455		EPA Technical Fact Sheet - Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA), November 2017	3M: Statements summarizing conclusions of studies are hearsay and should be treated under Rule 803(18).
P1.DL0460	NF000455856		3M: Hearsay within hearsay as to the apparent statements, on page 2, by "Tom" at the FFFC, nonparties to this case, about 3M having "created" the "legacy issues" with PFAS.  National Foam: FRE 401, 403, 602, Hearsay within Hearsay.
P1.DL0464	NF000165533		National Foam: Plaintiff has agreed to withdraw (through Tate Kunkle); 401, 403, HRS. Email exchange among 3 UK employees of UTC Fire & Security about foams manufactured in the UK and never sold in the US.  Kidde: 401, 403, HRS w/in HRS. This email exchange relates to foams manufactured in the UK and never sold in the U.S. and is therefore not relevant and unfairly prejudicial for the reasons discussed regarding Exhibit P1.DL0462. It also contains embedded hearsay as it references a memo from an employee of the U.S. Navy and questions he had about the impact to telomer foams resulting from the EPA Stewardship Program.
P1.DL0466	Kidde_Defendants_00091854		Kidde: 403, HRS w/in HRS. This document is unfairly prejudicial and inflammatory given that the discussion surrounding a testing protocol is not relevant. At deposition, plaintiff used the document principally to imply that the drafter of the email had made an insensitive joke. The document also contains embedded hearsay.
P1.DL0467	NF000257454		National Foam: 401, 403, HRS w/in HRS. It is stipulated that the only National Foam product that could have potential contributed to any contamination in Stuart is Universal Gold. It is not disputed that National Foam used Forafac 1157N (a fluorosurfactant containing C8) up until April 10, 2015 when the conversion of Universal Gold to a C6 product was completed. This document impliedly relates to National Foam's continued use of Forafac 1157N in Universal Gold beyond the conversion date, which is not in question in this case and this email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.
P1.DL0468	NF000415593		National Foam: 401, 403, HRS w/in HRS. It is stipulated that the only National Foam product that could have potential contributed to any contamination in Stuart is Universal Gold. It is not disputed that National Foam used Forafac 1157N (a fluorosurfactant containing C8) up until April 10, 2015 when the conversion of Universal Gold to a C6 product was completed. This document impliedly relates to National Foam's continued use of Forafac 1157N in Universal Gold beyond the conversion date, which is not in question in this case and this email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.

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Ex. No.	Beg Bates	Description	Defendants' Remaining Objections
P1.DL0469	NF000415595		National Foam: 401, 403, HRS w/in HRS. It is stipulated that the only National Foam product that could have potential contributed to any contamination in Stuart is Universal Gold. It is not disputed that National Foam used Forafac 1157N up until April 10, 2015 when the conversion of Universal Gold to a C6 product was completed. This document impliedly relates to National Foam's continued use of Forafac 1157N in Universal Gold beyond the conversion date and the ability to sell a AFFF containing C8 in Latin America, which are not in question in this case and this email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.
P1.DL0470	NF000415573		National Foam: 401, 403, HRS w/in HRS. It is stipulated that the only National Foam product that could have potential contributed to any contamination in Stuart is Universal Gold. It is not disputed that National Foam used Forafac 1157N (a fluorosurfactant containing C8) up until April 10, 2015 when the conversion of Universal Gold to a C6 product was completed. This document impliedly relates to National Foam's continued use of Forafac 1157N in Universal Gold beyond the conversion date, which is not in question in this case and this email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.
P1.DL0471	NF000470314		National Foam: 401, 403, HRS w/in HRS. This document is dated after the last sale of any C8-containing Universal Gold to the City of Stuart, but pertains to National Foam's continued use of certain C8 containing fluorosurfactants in products other than Universal Gold, which is the only National Foam product at issue in this case. Therefore, this email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.
P1.DL0472	Kidde_Defendants_00179722		Kidde: HRS w/in HRS. This document contains embedded hearsay as it contains references throughout to supposed statements made by Dynax employees to Kidde employees. Dynax is no longer a defendant in this action, and no hearsay exception applies.
P1.DL0479		Fire Fighting Foam Coalition State and Federal Legislation on AFFF (FFFC Website)	3M: 401/403 as to this website capture which describes lobbying activities by FFFC, which is not a party to the case; Hearsay as to this website because it is statement by FFFC, which is not a party to the case.
P1.DL0485	Kidde_Defendants_00069654		3M: 401/403 and hearsay within hearsay as to the speculative and inflammatory comments throughout this email repeating sentiments of unidentified nonparties such as "[s]ome people here think that 3M is plotting a rebirth in the fire industry" and "[o]thers think this is another American plot to dominate the world."  Kidde: 403, HRS w/in HRS. This document contains embedded hearsay as it references the supposed contents of a "confidential paper," which is not otherwise identified and to which no exception to the hearsay rule applies. The document is also more prejudicial than probative.
P1.DL0490	Kidde_Defendants_00067516		3M: 403 as to the incomplete and misleading representation of the scientific data on PFOS and as to the inflammatory and gratuitous reference to human birth defects.  National Foam: FRE 401, 403.  Kidde: 403. Plaintiff has sought to use the "ugly babies" language in this document in an inflammatory way and misleading fashion, any potential relevance of this document is outweighed by prejudice.
P1.DL0497	Kidde_Defendants_00251583		Kidde: 401, 403, HRS w/in HRS. Like P1.DL0462 and P1.DL0464, this document relates to a Kidde UK product which is not in question in this case and this email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.
P1.DL0519	NF000063179		3M: 401/403 as to the reference on page 1 to "an incident in a village in upstate NY that had an issue with PFOA contamination."  National Foam: FRE 401, 403.
P1.DL0806	3M_AFFF_MDL00647494		3M: Hearsay as to the document which on its face has no date or author.
P1.DL0898	3MA00967775		3M: Authenticity and hearsay as to the handwriting on pages 2-5.
P1.DL0934	3M_MN03423907		3M: Authenticity and hearsay as to the handwriting on page 4.
P1.DL1052	3M_AFFF_MDL00016709		3M: 401/403 as to the entire document because it concerns a different and irrelevant product (Scotchguard).
P1.DL1053	3M_BELL01443247		3M: 401/403 as to the entire document because it concerns different and irrelevant products (FC-807 and FC-10); Authenticity and hearsay as to the handwriting on pages 3, 4, and 6.
P1.DL1056			3M: Authenticity (appears to be a demonstrative not an exhibit).

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Ex. No.	Beg Bates	Description	Defendants' Remaining Objections
P1.DL1114		FFFC Best Practice Guidance for Use of Class B Firefighting Foams (5.2016)	3M: Hearsay because it is a statement of FFFC, which is not a party to the case.
P1.DL1115		FFFC Best Practice Guidance for Fluorinated Firefighting Foams	3M: Hearsay because it is a statement of FFFC, which is not a party to the case.
P1.DL1130	AFFFTC00717600		3M: Hearsay because it is a statement of FFFC, which is not a party to the case.
P1.DL1221	3M_BELL00538605		3M: 401 to the extent this includes production of products/chemistries not at issue in this case; Foundation, authenticity, and completeness as to the entirety of the document, the origin of which is unknown.
P1.DL1225	3M_BELL00538616		3M: Foundation, authenticity, and completeness as to the incomplete and draft nature of the document that is missing sections (see, e.g., page 14).
P1.DL1229	3M_AFFF_MDL01064043		3M: Authenticity and hearsay as to the handwriting on pages 1-2.
P1.DL1271		Transcript of Videotaped Deposition of Richard Newmark, PhD, October 23, 2019. In re Nylaan.	3M: Object to admission of deposition transcript.
P1.DL1387	3M_AFFF_MDL00019951		3M: Hearsay because document is unauthored and undated, and not made at or near the time of the events described.
P1.DL1391	3M_AFFF_MDL01789404		3M: Hearsay objection for handwritten notes.
P1.DL1396	3M_AFFF_MDL00419759		DuPont: 401, 403 as FC-143 is irrelevant to AFFF.
P1.DL1422	3M_MN05367080		3M: Rule 401 as it relates to page 4, which references products not at issue in this case.
P1.DL1423		EPA Risk Management for Per- and Polyfluoroalkyl Substances (PFAS) under TSCA printout	3M: Hearsay as it is a website overview page from the EPA.
P1.DL1424	3M_BELL00039796		3M: Hearsay as it is an unauthored, draft document.
P1.DL1425	3M_AFFF_MDL00118637		3M: Hearsay: unauthored, draft document.
P1.DL1428		Perfluorooctanesulfonyl fluoride, CRCs, Inc., working draft	3M: R401; R403; Hearsay 3rd party "working draft" document prepared w/ EPA funding.
P1.DL1487	ARKEMAINC_AFFF0000012		3M: Documents is from a third party and doesn't have to do with product at issue in this case; 401 and hearsay.
P1.DL1491	AFFFTC00111678		3M: Rule 401: Branded foam (Tyco) not at issue in this case.
P1.DL1570		Potential for Bioaccumulation demonstrative	3M: Lawyer created demonstrative; not an exhibit or record.
P1.DL1571		Demonstrative of DL9 and DL1571	3M: Lawyer created demonstrative; not an exhibit or record.
P1.DL1573			3M: Hearsay because document is unauthored and undated.
P1.DL1574		Toxic demonstrative	3M: Lawyer created demonstrative; not an exhibit or record.
P1.DL1577		Confidential Videotaped Deposition of Thomas DiPasquale, J.D., December 1, 2017, transcript excerpt	3M: Deposition Transcript Excerpt, not a document or record.
P1.DL1696	3M_BELL00500527		3M: Hearsay because document is unauthored and undated and source is unclear.
P1.DL1872	AFFF-MDL-CHE-00005308		3M: Hearsay because it is a statement of FFFC, which is not a party to the case.
P1.DL1909	FFFC000059		3M: Hearsay because it is a statement of FFFC, which is not a party to the case.
P1.DL1914	AFFF-MDL-EID-06608864		3M: Hearsay because it is a statement of FFFC, which is not a party to the case.
P1.DL1926	FF_NAVY11_00327164		3M: Hearsay because it is a statement of FFFC, which is not a party to this case.
P1.LP044	3M_BELL02717862		3M: 401 as to the email attachment (pages 2-5) because it concerns another product (FM 4115).
P1.LP052	3M_AFFF_MDL00578922		3M: Foundation, authenticity, and hearsay as to the entire exhibit, which lacks a date or author.
P1.LP053	3M_BELL01518421		3M: Foundation, authenticity, and hearsay as to the entire exhibit, which lacks an author.
P1.LP057	3M_AFFF_MDL00046983		3M: Foundation, authenticity, and hearsay as to the entire exhibit, which lacks an author.
P1.LP061	3M_BELL00054431		3M: 401/403 because DiPasquale's "thinking" about how 3M was going to "use the SPI" is far afield from Stuart's claims and will be used to unfairly suggest the entire company shared DiPasquale's thinking.
P1.LP084	3M_AFFF_MDL00048903		3M: Foundation, authenticity, and hearsay as to the entire exhibit, which lacks an author.
P1.LP184	3M_AFFF_MDL00030285		3M: Hearsay; no author; undated; not established at Chetan's deposition; hearsay within hearsay for statements by Jennifer Fields from Oregon State University.
P1.LP240	AFFFTC00218780		3M: 401/403; Hearsay and authenticity; slides from ACS Meeting presentation given by non-party (Dynax Corporation); additional hearsay objections as to attachments to slides, including journal article and letter from Australian Minister to FFFC.

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Ex. No.	Beg Bates	Description	Defendants' Remaining Objections
P1.LP423		The 3M™ ScaleGard™ HP Reverse Osmosis System is now NSF 58 Certified	3M: 401/403 -- Technical Update for 3M RO system unrelated to PFAS treatment not relevant to disputed issues; product is designed to clean water for hot and cold beverages.
P1.LP505		3M ScaleGard HP Reverse Osmosis WaterFilter System 5629101	3M: Hearsay website printout from third party; 401/403 -- information for RO system unrelated to PFAS treatment not relevant to disputed issues; product is designed to clean water for hot and cold beverages; 401/403 as to references to pool and spa filters and furnace filters.
P1.LP519	AFFFTC00196407		3M: Hearsay statement by non parties (Tyco and Dynax); 401/403.
P1.LP520	AFFFTC00196408		3M: Hearsay and authenticity; slides from ACS Meeting presentation given by non-party (Dynax Corporation); 401/403.
P1.LP525	AFFFTC00133287		3M: Hearsay internal memo from non-party (Dynax); 401/403.
P1.LP750	AMEREX_00445765		3M: Hearsay email correspondence between nonparties (OSU and Solberg); 401/403.
P1.LP754	3M_AFFF_MDL00122279		3M: Hearsay slide deck created by nonparty (Solberg).
P1.LP804	NF000069664		DuPont: 401, 403: A presentation being made to Angus Fire, which markets AFFF to the European market. Because its discussion includes potential regulatory implications for Europe (and is being presented Angus Fire), it's irrelevant, confusing to the jury, and misleading.
P1.LP806	NF000127224		National Foam: 401, 403. Email exchange with manager of sales for European products is irrelevant and discussion of "legislation" and views of others is therefore confusing and unduly prejudicial.
P1.LP811	NF000008609		National Foam: 401, 403, HRS w/in HRS. This document is dated after the last sale of any C8-containing Universal Gold to the City of Stuart, but pertains to National Foam's continued use of certain C8 containing fluorosurfactants in products other than Universal Gold, which is the only National Foam product at issue in this case. Therefore, this email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.
P1.LP812	NF000008619		National Foam: 401, 403, HRS w/in HRS. This document pertains to National Foam's continued use of certain C8 containing fluorosurfactants after the date that National Foam ceased using any C8 fluorosurfactant in Universal Gold, which is the only National Foam product at issue in this case. This email is therefore irrelevant and would be both confusing and unfairly prejudicial to show the jury.
P2.DL1803	WSP_Stuart_008000		3M: Illegible.  DuPont: illegible.
P2.Stuart029		data	DuPont: Annotations for demonstrative purposes.
P2.Stuart126	Stuart_2:18-cv-03487_00062390		3M: Completeness (document appears to be cut off at p. 9)
P2.Stuart169	Stuart_2:18-cv-03487_00774406		3M: Authentication; hearsay; appears to be improper summary of AFFF sales created for purposes of litigation; hearsay within hearsay as to citations to deposition transcripts.  Kidde: FOD, HRS, 901, improper summary of AFFF sales created for purposes of litigation.
P2.Stuart234	Stuart_2:18-cv-03487_00742686		3M: Authentication; improper summary; hearsay; unauthored, undated, improper summary of damages apparently prepared for purposes of litigation.  DuPont: 401/403/1006 improper summary.  Kidde: 401, 403, FOD.
P2.Stuart239	Stuart_2:18-cv-03487_00775762		DuPont: 401/403 unclear where document came from.
P2.Stuart240	Stuart_2:18-cv-03487_00717735		3M: Authentication; improper summary; hearsay; unauthored, undated improper summary of damages apparently prepared for purposes of litigation.  DuPont: 401/403/1006 improper summary.
P2.Stuart241	Stuart_2:18-cv-03487_00775774		3M: Improper summary; hearsay; hearsay within hearsay as to invoices; improper summary of damages apparently prepared for purposes of litigation.  DuPont: 401/403/1006 improper summary.
P2.Stuart243	STUART_2:18-CV-03487_00775430		DuPont: Hearsay.
P2.Stuart686	STUART_2:18-CV-03487_00775770		3M: Authenticity and foundation as to the entirety of the document because it is not clear on its face what it is, who wrote it, or when.

May 8, 2023

City of Stuart, FL, v. 3M Company et al.,  
No. 2:18-cv-03487

## Plaintiff's Core Trial Exhibits

to which Defendants Have Remaining Objections Outside of Motion in Limine Objections

Ex. No.	Beg Bates	Description	Defendants' Remaining Objections
P2.Stuart701	Stuart_2:18-cv-03487_00379072		Kidde: 401, 403.
P2.Stuart840	STUART_2:18-CV-03487_00778086		3M: Authentication; improper summary; hearsay; unauthored, undated improper summary of damages apparently prepared for purposes of litigation.  DuPont: 401/403/1006 improper summary.  Kidde: 401, 403, foundation.
P2.Stuart875		Town of Jupiter Staff Report for Comp Plan Text Amendment, dated 12/10/2019	3M: Authentication; 801 non-party document; Town of Jupiter Document plus consultant report of Town of Jupiter.  DuPont: 401/403 and hearsay.